

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 22-CR-20104-JEM(s)(s)(s)

UNITED STATES OF AMERICA

vs.

RODOLPHE JAAR,

Defendant.

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**STIPULATED FACTUAL PROFFER IN SUPPORT OF PLEA**

If this matter were to proceed to trial, the Government would prove the following facts beyond a reasonable doubt. The Parties agree that these facts, which do not include all facts known to the Government and the Defendant, **RODOLPHE JAAR**, are sufficient to prove the guilt of the Defendant of the above-referenced Third Superseding Indictment:

Starting in approximately late May 2021, JAAR provided material support and resources, specifically personnel (himself included), funds, materials, and services, knowing and intending that the material support and resources would be used to prepare for and carry out the removal of Haitian President Jovenel Moise by kidnapping and/or assassination (the "operation"), and the death of President Jovenel Moise resulted from the operation.

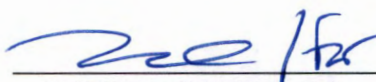
In particular, among other things, JAAR provided funds that were used in part to acquire weapons to facilitate carrying out the operation. JAAR also provided food, lodging, and other necessities to various co-conspirators, and JAAR provided funding to bribe certain Haitian officials who were responsible for providing security to President Moise so that JAAR's co-conspirators would be able to obtain access to President Moise during the operation.

JAAR attended various meetings with co-conspirators to discuss the operation. At various meetings, JAAR met with Antonio Intriago (who had traveled to Haiti from the Southern District of Florida), James Solages, Joseph Joel John, Joseph Vincent, German Rivera, and others. On July 6, 2021, the night before the operation, while many of JAAR's co-conspirators, including James Solages, Joseph Joel John, Joseph Vincent, German Rivera, and Mario Antonio Palacios Palacios, were staging for the operation at a property controlled by JAAR, James Solages told JAAR and others present, in substance, that the operation was going to result in the assassination of President Moise.

On July 7, 2021, JAAR's co-conspirators entered the presidential residence in Haiti with the intent and purpose of killing President Moise, and in fact, the President was killed. The aforementioned criminal acts were calculated to influence and affect the conduct of the Haitian government by intimidation and coercion, and JAAR intended to do so.

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

Date: 8/24/23

By:   
ANDREA GOLDBARG  
ASSISTANT U.S. ATTORNEY

Date: 3/24/23

By:   
FRANK SCHWARTZ, ESQ.  
ATTORNEY FOR DEFENDANT

Date: 2/24/23

By:   
RODOLPHE JAAR  
DEFENDANT